

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

RICHARD and VIOLET FLORES,

Plaintiffs,
vs. No. 2014-cv-00669-KG-GBW

UNITED STATES OF AMERICA,

Defendant.

STIPULATION OF DISMISSAL

COME NOW Plaintiffs and Defendant, by and through counsel of record, pursuant to Fed.R.Civ.Pro. 41(a)(1)(A)(ii), and stipulate to dismissal of this cause, in its entirety, and state:

1. The Plaintiffs filed their Complaint July 25, 2014; process was timely served; the Government filed its timely Motion to Dismiss on December 24, 2014; time to respond to that motion was extended (unopposed) on January 5, 2015, to and until January 28, 2015, for good cause, which consisted mainly of considering this dismissal.

2. The Plaintiffs have agreed that the timeliness of this suit will likely fail, and the matter would likely be dismissed eventually for reasons related to the applicable statutes of limitations.

WHEREFORE, the Plaintiffs, individually and jointly, along with the Government's attorney, agree to Dismissal of this action WITH PREJUDICE, in its entirety.

SUBMITTED BY:

/s/ Richard Flores 01/26/2015

RICHARD FLORES

/s/ Violet L. Flores 01/26/15

VIOLET FLORES

For Defendant USA:

Approved by telephone 1/26/15

RUTH F. KEEGAN, AUSA

Submitted by:

Electronically filed:

William A. L'Esperance

William A. L'Esperance
Counselor at Law
P.O. Box 90668
Albuquerque, N.M. 87199
(505) 266-8482
walesperance@wwdb.org

Electronically served:

1/26/2015 William A. L'Esperance